

### **REMARKS/ARGUMENT**

Independent claim 6 stands rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent no. 6,116,461 to Broadfield. It is the examiner's position that the Broadfield patent discloses a similar drawer device comprising the elements listed on the bottom of page 2 and top of page 3 of the Office action. It is respectfully submitted that the examiner has not given proper weight to the claim limitations that state that the insert is "approximately the length of said tray" and that the insert defines "the volume of the individual drawer". As seen in figure 6 of the pending application, each of the inserts is approximately the length of the tray, and defines the volume of the individual drawers 60-1 through 60-12. See also figures 7, 8 and 9. In contrast, the insert of Broadfield is merely a pocket which is neither the length of the tray nor does it define the volume of an individual drawer. Accordingly, it is respectfully submitted that when those limitations of independent claim 6 are fully considered, Broadfield neither anticipates nor renders obvious independent claim 6.

Claim 6 has not been rejected for any other reason other than anticipation based on Broadfield, and that rejection is believed to be overcome in view of the foregoing arguments. Accordingly, claim 6, and the claims dependant therefrom, claims 7 through 10, are also believed to be in condition for allowance.

Claims 11 through 47 were indicated in the Office action as being allowable. Through this amendment, applicants have removed the word "worm" from independent claims 11, 18 and 32. It is applicants' position that it is sufficient to recite that the gear be self-locking, without further specifying the type of self-locking gear. It is respectfully submitted that the recitation of a self-locking gear, in combination with the other elements of these claims, defines over the prior art such that applicants' claims need not be restricted to self-locking worm gears. Therefore, applicants respectfully suggest that the allowance of claims 11 through 47 is not materially effected by that change in language.

Applicants have made a diligent effort to place the instant application in condition for allowance. Accordingly, a Notice of Allowance for claims 6 through 47 is respectfully

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requested. If the examiner is of the opinion that the instant application is in condition for disposition other than through allowance, he has respectfully requested to contact applicants' attorney at the telephone listed below so that additional changes may be discussed.

Respectfully submitted,



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